

SIGAL CHATTAH
United States Attorney
District of Nevada
Nevada Bar No. 8264

VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar No. 12504
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6533
Virginia.Tomova@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Kathleen Denice Clippinger,

Plaintiff,

v.

United States of America ex rel United
States Postal Service, et al.,

Defendants.

Case No. 3:25-cv-00091-MMD-CLB

**Order Granting Stipulation to Extend
Time to Answer**

(Second Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Kathleen Denice Clippinger, and the United States of America, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed her Complaint for Declaratory and Injunctive Relief on February 14, 2025. ECF No. 1.

Plaintiff personally served the United States with a copy of the Summons and Complaint on February 24, 2025.

The current deadline for the United States to respond to Plaintiff's Complaint is May 27, 2025.

On May 22, 2025, undersigned counsel for Plaintiff and the United States agreed to a 30-day extension of time for the United States to complete their review of the record, in order to accommodate the staffing shortages and relatedly substantial workload handled by undersigned AUSA. The standard for extending time is good cause. *See* FRCP 6(b)(1)(A).

1 Accordingly, the parties, through undersigned counsel, submit this stipulation for a
2 30-day extension from May 27, 2025, to **June 27, 2025**, for the United States to file an
3 answer or otherwise respond to the Complaint. This is the United States's second request
4 for an extension of time.

5 This stipulated request is filed in good faith and not for the purposes of undue delay.

6 Respectfully submitted this 27th day of May 2025.

7 **Richard Harris Law Firm**

8 /s/ Joshua R. Dahan
9 JOSHUA R. DAHAN, ESQ.
Nevada Bar No. 16516
10 RICHARD A. HARRIS, ESQ.
Nevada Bar No. 505
6900 S. McCarran Boulevard, #1010
11 Reno, Nevada 89509
JDahan@richardharrislaw.com

12 *Attorneys for the Plaintiff*

SIGAL CHATTAH
United States Attorney

/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney

Attorneys for the Federal Defendant

14 **IT IS SO ORDERED:**

15
16 
17

18 **UNITED STATES MAGISTRATE JUDGE**

19 **DATED:** May 27, 2025
20
21
22
23
24
25
26
27
28